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MELISSA IONESCU

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 MELISSA IONESCU, an individual,  
10 Plaintiff,  
11 vs.  
12 BOSTON SCIENTIFIC CORPORATION;  
JOHNSON & JOHNSON; JOHNSON &  
13 JOHNSON HEALTH CARE SYSTEMS, INC.;  
ETHICON, INC.; ETHICON LLC; DOES 1-10,  
14 and ROE ENTITIES 11-20,  
15 Defendants.

Case No.: 2:19-CV-00801 -APG-NJK

**STIPULATION AND ORDER FOR  
EXTENSION OF DEADLINE FOR  
PLAINTIFF TO FILE AN OPPOSITION  
TO DEFENDANT, BOSTON  
SCIENTIFIC CORPORATION'S  
MOTION TO DISMISS**

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17 Come now, Plaintiff, Melissa Ionescu ("Plaintiff"), by and through her counsel of record, Carrie  
18 Hurtik, Esq. of the law firm Hurtik Law & Associates; and Defendant, Boston Scientific Corporation, by  
19 and through its counsel of record, Howard J. Russell, Esq. and Josephine E. Groh, Esq. of the law firm  
20 Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC, and hereby submit the following Stipulation and  
21 Order for Extension of Deadline for Plaintiff to file an Opposition to Defendant, Boston Scientific  
22 Corporation's Motion to Dismiss.  
23

24 Boston Scientific Corporation filed its Notice of Removal on May 8, 2019, a Certificate of  
25 Service of Court Minutes on May 9, 2019 and its Motion to Dismiss on May 15, 2019. The current  
26 deadline for Plaintiff to file her Opposition to the Motion to Dismiss is May 27, 2019. The Parties have  
27 stipulated that Plaintiff will have until June 7, 2019 to file an Opposition to the Motion to Dismiss.  
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1 There is good cause to allow Plaintiff to file the Opposition by June 7, 2019 as it is the first request for  
2 any type of extension and it would not be prejudicial to any of the Parties.  
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4 Dated: May 29, 2019

5 **HURTIK LAW & ASSOCIATES**

6  
7 */s/ Linda L. Lay*

8 \_\_\_\_\_  
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11 Attorneys for Plaintiff,  
12 MELISSA IONESCU

Dated: May 29, 2019

5 **WEINBERG, WHEELER, HUDGINS, GUNN &**  
6 **DIAL, LLC**

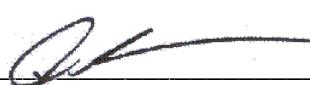
7 */s/ Howard J. Russell*

8 \_\_\_\_\_  
9 **HOWARD J. RUSSELL, ESQ.**  
**JOSEPHINE E. GROH, ESQ.**  
10 6385 S. Rainbow Blvd., Suite 400  
Las Vegas, NV 89119  
11 Attorneys for Defendant, BOSTON SCIENTIFIC  
12 CORPORATION

13 **ORDER**

14 Based upon the Stipulation by the Parties hereto, and good cause appearing, it is hereby  
15 Ordered that Plaintiff, Melissa Ionescu, shall have until Friday, June 7, 2019, to respond to Defendant,  
16 BOSTON SCIENTIFIC CORPORATION's Motion to Dismiss Plaintiff's Complaint (ECF No. 5).  
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18 **IT IS SO ORDERED**

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21 **UNITED STATES DISTRICT JUDGE**  
Dated: May 30, 2019.  
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